

EXHIBIT G

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Attorneys for Defendants **CANDICE**
ELAINE WILLIAMS, an individual doing
business as **FAIRWAY ASSOCIATES**;
KIMBERLY LYNN BACA, an individual
doing business as **FAIRWAY**
ASSOCIATES

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

TARA ANN BARTOLI, an individual;
BRETT THOMAS BARTOLI, an
individual, **TARA ANN BARTOLI** as
Guardian ad litem for M.B., and **TARA**
ANN BARTOLI as Guardian ad litem
for L.B.,

Plaintiffs,

vs.

RANCHO CALIFORNIA RV
RESORT OWNERS ASSOCIATION, a
California nonprofit mutual benefit
corporation; **DESERT RESORT**
MANAGEMENT, INC., a California
corporation; **CARI BURLEIGH**, an
individual; **CANDICE ELAINE**
WILLIAMS, an individual doing
business as **FAIRWAY ASSOCIATES**;
KIMBERLY LYNN BACA, an
individual doing business as
FAIRWAY ASSOCIATES; and **DOES**
1 through 10, inclusive,

Defendants.

CASE NO. 5:18-cv-02643-MWF-KK

DEFENDANT CANDICE ELAINE
WILLIAMS' RESPONSES TO
PLAINTIFF'S REQUEST FOR
PRODUCTION OF DOCUMENTS,
SET ONE

The Hon. Michael W. FITZGERALD

Trial Date: None Set

1 PROPOUNDING PARTY: PLAINTIFF, TARA ANN BARTOLI
 2 RESPONDING PARTY: DEFENDANT, CANDICE ELAINE WILLIAMS
 3 SET NO.: ONE (1)

4 Defendant CANDICE ELAINE WILLIAMS ("Defendant" or "Responding
 5 Party") hereby responds to the first set of Plaintiff TARA ANN BARTOLI's
 6 ("Plaintiff") Request for Production of Documents, pursuant to California Code of
 7 Civil Procedure §2031.010, as follows:

8 **PRELIMINARY STATEMENT**

9 Defendant has not yet completed its investigation of the facts concerning this
 10 case. Formal discovery is ongoing and defendant has not completed trial
 11 preparation. Accordingly, these responses are provided without prejudice to the
 12 right of defendant to introduce into evidence subsequently gathered information.

13 **GENERAL OBJECTIONS AND RESERVATIONS**

14 As to each and every Request in Plaintiffs' Request for Production of
 15 Documents, Set One, Defendant states the following:

16 A. Defendant has not yet completed its discovery and investigation of the
 17 facts giving rise to this action, but has made a diligent, good faith effort to obtain all
 18 information responsive to these Requests within Defendant's possession, custody, or
 19 control. Accordingly, these responses are made without prejudice to Defendant's
 20 right to introduce prior to or at the time of trial or otherwise use any additional
 21 information it may obtain as a result of Defendant's continuing discovery and
 22 investigation, but Defendant assumes no obligation, beyond that imposed by FRCP
 23 26(e) and 34, to supplement and amend these responses to reflect witnesses, facts, or
 24 other information discovered following the date of these responses.

25 B. Defendant has based these responses on the assumption that Plaintiffs
 26 did not intend to seek information protected against discovery by the attorney-client
 27 privilege or the attorney work-product doctrine, the right of privacy laws, the
 28 protection afforded trade secrets or any other applicable privilege or protection from

disclosure. To the extent that the requests are intended to elicit such privileged or protected information, Defendant objects thereto as to each request and asserts the applicable privilege or protection to the fullest extent permitted by law.

C. To the extent that Defendant responds to these requests, Defendant does not concede the relevancy of those responses to this action, nor does it concede that such responses may be used for any purpose in this action or any other action or proceeding. Defendant expressly reserves the right to object to further discovery into the subject matter of any request or any portion thereof.

D. Defendant objects to each request to the extent that it seeks information equally available to Plaintiffs or information that is not within Defendant's possession, custody, or control.

E. Defendant objects to the requests to the extent that they are intended to be and are overly broad, unduly burdensome and oppressive.

F. Defendant objects to each request to the extent it seeks information that is not relevant to the subject matter of this action, and is not reasonably calculated to lead to the discovery of admissible evidence.

Without waiving any of the foregoing General Objections, each of which applies to each and every one of the individual responses set forth below and is incorporated by this reference therein (whether or not specifically stated in the response), Defendant responds to the individual requests as follows:

RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE

REQUEST NO. 1:

All documents you reviewed or relied on when drafting your Answer to Plaintiffs' Complaint.

RESPONSE TO REQUEST NO. 1:

Defendant refers to and incorporates by reference its General Objections set forth hereinabove. In addition, this request is overbroad in time and scope, seeks

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**RANCHO CALIFORNIA RV
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California nonprofit mutual benefit
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individual; CANDICE ELAINE
WILLIAMS, an individual doing
business as FAIRWAY ASSOCIATES;
KIMBERLY LYNN BACA, an
individual doing business as
FAIRWAY ASSOCIATES; and DOES
1 through 10, inclusive,**

Defendants.

CASE NO. 5:18-cv-02643-MWF-KK

**DEFENDANT KIMBERLY LYNN
BACA'S RESPONSES TO
PLAINTIFF'S REQUEST FOR
PRODUCTION OF DOCUMENTS,
SET ONE**

The Hon. Michael W. FITZGERALD

Trial Date: None Set

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4846-2334-8640.1

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**DEFENDANT KIMBERLY LYNN BACA'S RESPONSES TO PLAINTIFF'S REQUEST FOR PRODUCTION OF
DOCUMENTS, SET ONE**

1 PROPOUNDING PARTY: PLAINTIFF TARA BARTOLI

2 RESPONDING PARTY: DEFENDANT KIMBERLY LYNN BACA

3 SET NO.: ONE (1)

4 Defendant KIMBERLY LYNN BACA ("Defendant" or "Responding Party")
5 hereby responds to the first set of Plaintiff TARA BARTOLI's ("Plaintiff") Request
6 for Production of Documents, pursuant to California Code of Civil Procedure
7 §2031.010, as follows:

8 **PRELIMINARY STATEMENT**

9 Defendant has not yet completed its investigation of the facts concerning this
10 case. Formal discovery is ongoing and defendant has not completed trial
11 preparation. Accordingly, these responses are provided without prejudice to the
12 right of defendant to introduce into evidence subsequently gathered information.

13 **GENERAL OBJECTIONS AND RESERVATIONS**

14 As to each and every Request in Plaintiffs' Request for Production of
15 Documents, Set One, Defendant states the following:

16 A. Defendant has not yet completed its discovery and investigation of the
17 facts giving rise to this action, but has made a diligent, good faith effort to obtain all
18 information responsive to these Requests within Defendant's possession, custody, or
19 control. Accordingly, these responses are made without prejudice to Defendant's
20 right to introduce prior to or at the time of trial or otherwise use any additional
21 information it may obtain as a result of Defendant's continuing discovery and
22 investigation, but Defendant assumes no obligation, beyond that imposed by FRCP
23 26(e) and 34, to supplement and amend these responses to reflect witnesses, facts, or
24 other information discovered following the date of these responses.

25 B. Defendant has based these responses on the assumption that Plaintiffs
26 did not intend to seek information protected against discovery by the attorney-client
27 privilege or the attorney work-product doctrine, the right of privacy laws, the
28 protection afforded trade secrets or any other applicable privilege or protection from

1 disclosure. To the extent that the requests are intended to elicit such privileged or
 2 protected information, Defendant objects thereto as to each request and asserts the
 3 applicable privilege or protection to the fullest extent permitted by law.

4 C. To the extent that Defendant responds to these requests, Defendant
 5 does not concede the relevancy of those responses to this action, nor does it concede
 6 that such responses may be used for any purpose in this action or any other action or
 7 proceeding. Defendant expressly reserves the right to object to further discovery
 8 into the subject matter of any request or any portion thereof.

9 D. Defendant objects to each request to the extent that it seeks information
 10 equally available to Plaintiffs or information that is not within Defendant's
 11 possession, custody, or control.

12 E. Defendant objects to the requests to the extent that they are intended to
 13 be and are overly broad, unduly burdensome and oppressive.

14 F. Defendant objects to each request to the extent it seeks information that
 15 is not relevant to the subject matter of this action, and is not reasonably calculated to
 16 lead to the discovery of admissible evidence.

17 Without waiving any of the foregoing General Objections, each of which
 18 applies to each and every one of the individual responses set forth below and is
 19 incorporated by this reference therein (whether or not specifically stated in the
 20 response), Defendant responds to the individual requests as follows:

21 **RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS, SET**
 22 **ONE**

23 **REQUEST NO. 1:**

24 All documents you reviewed or relied on when drafting your Answer to
 25 Plaintiffs' Complaint.

26 **RESPONSE TO REQUEST NO. 1:**

27 Defendant refers to and incorporates by reference its General Objections set
 28 forth hereinabove. In addition, this request is overbroad in time and scope, seeks